



June 26, 2006

Dr. David Carlson
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Subject: Tentative Waste Discharge Requirements and Time Schedule Order for
City of Tracy Wastewater Treatment Plant

Dear Dr. Carlson:

California Urban Water Agencies (CUWA) has reviewed the subject tentative order and would like to commend Central Valley Regional Water Quality Control Board (Regional Water Board) staff on their commitment to protecting the MUN beneficial use in the Delta. Many of CUWA's members rely on the Delta as a source of drinking water. Requiring filtration of Tracy's wastewater to reduce the loading of pathogens discharged to Old River and requiring nitrification/denitrification to reduce the loading of nitrogen will provide additional protection of drinking water supplies beyond what is currently provided.

CUWA has several other water quality concerns that are difficult to address with the current regulatory framework so we are working with the Regional Water Board on the technical studies needed to support a Basin Plan amendment to provide greater protection of drinking water supplies. The key constituents of concern to drinking water providers are organic carbon, nutrients, salinity, bromide, and pathogens. The Drinking Water Policy technical studies include an evaluation of the loads of these constituents from sources in the watershed and an evaluation of the measures that can be taken to control the key sources. As part of these studies, the Regional Water Board will request that certain wastewater dischargers conduct monitoring to gather data on effluent concentrations of the key constituents of concern. The Tracy Wastewater Treatment Plant has been identified as one of the plants that will be asked to participate in this monitoring program.

Organic carbon is a precursor that combines with disinfectants used in water treatment plants to produce harmful disinfection byproducts such as trihalomethanes and haloacetic acids. Organic carbon in source waters increases the ozone dosage which can lead to the formation of bromate in waters taken from the Delta. The tentative waste discharge requirements do not establish an effluent limitation for organic carbon due largely to the fact that a water quality objective for organic carbon has not been adopted.

Nutrients (nitrogen and phosphorus) that stimulate algal growth in the Delta, water conveyance facilities, and downstream reservoirs, are a key concern of CUWA's members. In recent years CUWA's members have experienced an increased frequency and severity of taste and odor episodes associated with algal growth in waters diverted from the Delta. Although, the tentative waste discharge requirements establish effluent limitations for ammonia, nitrate, and nitrite, the allowable concentrations in the effluent are not based on the biostimulatory impacts of wastewater. In addition, phosphorus is not addressed in the tentative waste discharge requirements.

Salinity is a key constituent of concern due to the impacts on downstream water use and the impacts on the ability of the State Water Project and Central Valley Water Project to meet Delta salinity objectives. CUWA is pleased that the Regional Water Board is requiring Tracy to conduct an evaluation of its wastewater to determine reasonable source control and treatment measures that can be taken to reduce the salinity of the effluent. Source control measures should be fully explored to reduce the overall salinity of the Tracy effluent.

Based on the current schedule for the Drinking Water Policy efforts, CUWA expects that the Basin Plan will be amended in 2009 or 2010 to incorporate additional protection of drinking water supplies. Since the tentative waste discharge requirements for Tracy will extend to 2011, CUWA requests that the Regional Water Board add the following reopener provision to Section VI.C.1 of the waste discharge requirements:

"Central Valley Drinking Water Policy. If water quality objectives for organic carbon, nutrients, salinity, bromide, and/or pathogens are adopted to protect drinking water supplies in the Central Valley, this permit may be reopened and modified to require that these objectives be met."

CUWA also requests that the Regional Water Board include a requirement to immediately notify downstream drinking water agencies if there are spills of untreated or partially treated wastewater from the Tracy Wastewater Treatment Plant or collection system that reach Delta waters. Attachment 1 is a list of the agencies that should be notified. If the Regional Water Board agrees to include this provision in the final waste discharge requirements, CUWA will provide a list of agency staff and phone numbers.

CUWA appreciates the efforts of Regional Water Board staff to protect drinking water quality, both by requiring tertiary treatment of the Tracy wastewater and by working with us on the Drinking Water Policy. If you have any questions on our comments, please contact our water quality consultant, Elaine Archibald, at 916-736-3713.

Sincerely,

A handwritten signature in dark ink, appearing to read "Steve Macaulay", with a stylized flourish at the end.

Steve Macaulay
Executive Director

Attachment 1
Agencies to Notify About Tracy Wastewater Spills

Alameda County Flood Control and Water Conservation District, Zone 7
Alameda County Water District
Santa Clara Valley Water District
Contra Costa Water District
California Department of Water Resources